


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ARNOLD JACKSON,	:	07 CV 3320 (SHS)
Plaintiff,	:	
-against-	:	
WATERMAN STEAMSHIP CORP.,	:	DECLARATION OF
Defendant.	:	LISA G. JOHNSTON PURSUANT
	:	TO TITLE 28 U.S.C. § 1746
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LISA G. JOHNSTON, a person of the full age of majority, declares as follows:

1. Waterman Steamship Corporation (hereinafter sometimes referred to as the "Company"), a subsidiary of International Shipholding Corporation, is a New York corporation, which at the time of Arnold Jackson's alleged injury, maintained its principal place of business at New Orleans, Louisiana.
2. At the time that the Company filed its declaratory judgment action in the Eastern District of Louisiana on February 16, 2007, Waterman Steamship Corporation's principal place of business was in New Orleans, Louisiana.
3. The only witnesses to Arnold Jackson's alleged accident aboard the M/V ATLANTIC FOREST identified to date are Mr. Alfred Lee Polk and Mr. Kyle Parson.
4. Neither individual is currently employed by the Company.
5. Mr. Alfred Lee Polk has not been employed by Waterman Steamship Corporation since December 2006. Mr. Polk's address at the time he left employment with the Company was 6562 Coveview Drive, New Orleans, Louisiana, 70126.
6. Mr. Kyle Parson has not been employed by Waterman Steamship Corporation since January 2007. Mr. Parson's address at the time he left employment with the Company was 943 Hunley Drive, Virginia Beach, Virginia, 23462.
7. I declare under penalty of perjury that the foregoing is true and correct.

Dated in Mobile, Alabama, on August 23, 2007



LISA G. JOHNSTON